

c. 2

1

15000000

(Y) Person(s) Interviewed	Title	Telephone
<u>DOUGLAS R. McLEISH</u>	<u>ENERGY/ENVIR. ENG.</u>	<u>608/364-7580</u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>JACK HOLZER</u>	<u>EPA/ INSPECTOR</u>	<u>815/987-7404</u>

II. Section A: Scope of Inspection.

1. Interim Status standards for the treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 35 Ill. Adm. Code 725.101. Complete Inspection Form A, Sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage or disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit application process(es) (EPA Form 3510-3)</u>		<u>Inspection Form A section(s)</u>
S01	<input checked="" type="checkbox"/> storage in containers	I
S02	<input type="checkbox"/> storage in tanks	J
T01	<input type="checkbox"/> treatment in tanks	J
S04	<input type="checkbox"/> storage in surface impoundment	K, F
T02	<input type="checkbox"/> treatment in surface impoundment	K, F
D83	<input type="checkbox"/> disposal in surface impoundment	K, F
S03	<input type="checkbox"/> storage in waste pile	L
D81	<input type="checkbox"/> disposal by land application	M, F
D80	<input type="checkbox"/> disposal in landfill	N, F
T03	<input type="checkbox"/> treatment by incineration	O, P
T04	<input type="checkbox"/> treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other Activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. NO PART A SUBMITTED
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 Ill. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	—	N/A
2. Facility expansion?	✓	—	—	NEW WASTE WATER TREATMENT PLANT TO BE STARTED SOON.
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	✓	—	2 TO 3 HAULERS HAVE TAKEN SAMPLES BUT, HAVE NOT SENT RESULTS AS YET-
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	✓	—	
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	PLANT IS WORKING 7 DAY WEEK-
2. Artificial or natural barrier around facility?	✓	—	—	FENCE AROUND BLACKHAWK PLANT-
3. Controlled entry?	—	✓	—	NO GUARD ON GATES AT PRESENT-
4. Danger sign(s) at entrance?	—	✓	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	MAINT. MAN SET PUMP ON MACHINE UP WORKING AND OIL WAS PUMPED OUT ON FLOOR
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	

\*Not Inspected

# III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>NO INSPECTIONS</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
6. Security devices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
7. Operating and structural devices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
8. Inspection log?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
2. Job descriptions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>NO</u>
3. Description of training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>NO TRAINING PROGRAM</u>
4. Records of training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>" " "</u>
5. Have facility personnel received required training by 5-19-81?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
6. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>IN CONCRETE VASES</u>
2. No smoking signs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

\*Not Inspected

IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes	No	NI*	Remarks
-----	----	-----	---------

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?
2. Telephone or 2-way radios at the scene of operations?
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Y INTER-FIRE DEPT.

✓ TELEPHONES AND SOME RADIOS

Indicate the volume of water and/or foam available for fire control: 1

HAVE WELLS (TWO) THAT RUN 140 GPM AND 330 GPM WITH ELEVATED STORAGE

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?
2. Is emergency equipment maintained in operable conditions?

\_\_\_\_\_

\_\_\_\_\_

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

✓ TELEPHONES

(E) Is there adequate aisle space for unobstructed movement?

✓ \_\_\_\_\_

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).)

\_\_\_\_\_ ✓ \_\_\_\_\_

PERNORD IS WORKING ON CONTINGENCY PLAN

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

\_\_\_\_\_ ✓ \_\_\_\_\_

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

\_\_\_\_\_ ✓ \_\_\_\_\_

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

\_\_\_\_\_ ✓ \_\_\_\_\_

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

\_\_\_\_\_ ✓ \_\_\_\_\_

# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>PEOPLE THAT SHOULD BE CALLED</u> <u>WOULD HAVE AUTHORITY</u>
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

\_\_\_\_ ✓ \_\_\_\_

*ONLY HAD TWO YEARS  
ON HAND - PAST PRACTICE  
USED TO BE DUMP THE HAZARDOUS  
WASTE IN WITH THE WASTE OIL.*

2. Does the operating record contain the following information:

\*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

\_\_\_\_ ✓ \_\_\_\_

\_\_\_\_\_

c. The location and quantity of each hazardous waste within the facility?

\_\_\_\_ ✓ \_\_\_\_

\_\_\_\_\_

\*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

\_\_\_\_ ✓ \_\_\_\_

\_\_\_\_\_

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

\_\_\_\_ ✓ \_\_\_\_

\_\_\_\_\_

f. Reports detailing all incidents that required implementation of the Contingency Plan?

\_\_\_\_ ✓ \_\_\_\_

\_\_\_\_\_

g. All closure and post closure costs as applicable? (Effective 5-19-81)

\_\_\_\_ ✓ \_\_\_\_

\_\_\_\_\_

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities



## 1

- \_\_\_\_\_ ✓ \_\_\_\_\_

- \_\_\_\_\_

- \_\_\_\_\_

- \_\_\_\_\_

\_\_\_\_\_ ✓ \_\_\_\_\_

- ✓ VARIETIES ABOUT TWO FEET  
IN AND BASED MAIN CRACK

- \_\_\_\_\_

- [illegible]

- SECTION

- \_\_\_\_\_ ✓ \_\_\_\_\_

- \_\_\_\_\_

Yes No NI\* Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

--- N/A ---

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

--- N/A ---

J  
TANKS

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

--- N/A --- NO TANK STORAGE OF HAZARDOUS WASTE ON SITE -

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

--- --- ---

3. Do continuous feed systems have a waste-feed cutoff?

--- --- ---

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

--- --- ---

5. Are required daily and weekly inspections done?

--- --- ---

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

--- --- ---

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

--- --- ---

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: N/A gallons

Tank diameter: 5 feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

✓ \_\_\_\_\_

2. Do earthen dikes have protective covers?

✓ \_\_\_\_\_ NEW TREATMENT PLANT IS GOING TO BE CONSTRUCTED IN A FEW MONTHS

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

N/A \_\_\_\_\_

4. Is the freeboard level inspected at least daily?

✓ \_\_\_\_\_

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

✓ \_\_\_\_\_ THERE IS NO LEAK SEE PAGE 14 IN NW CORNER

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

N/A \_\_\_\_\_

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

N/A \_\_\_\_\_

## WASTE PILES

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	<del>HAVE ABOUT 3000 YARDS</del>
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	<del>OF WASTE PILES. WHEN TWO</del> <del>WILLEN IN A PILE. WHEN NEARBY</del> <del>BUT NEIGHBORS COMPLAINING SO</del> <del>THEY STOPPED DUMPING MATERIAL</del> <del>WILL BE REMOVING ALL AT TIME</del> <del>OF NEW CONSTRUCTION OF TREATMENT</del> <del>PLANT</del>
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

## LAND TREATMENT

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Is treated hazardous waste capable of biological or chemical degradation?  
 ----- *SLUDGE AND FERTILIZER HAD BEEN USED IN PAST YEAR. NONE AT PRESENT.*
2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?  
 -----
3. Is waste analyzed according to 265.273?  
 -----
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?  
 -----
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?  
 -----
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?  
 -----
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?  
 -----
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)  
 -----
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)  
 -----

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
4. Are inspection procedures followed according to 265.403?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class; DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<u>N/A</u>	<input type="checkbox"/>	<u>NONE NEEDED</u>

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>UNABLE TO INSPECT THE 9 DRUMS IN STORAGE VENT.</u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NO TANK STORAGE
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do continuous feed systems have a waste-feed cutoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Are required daily and weekly inspections done?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>ONE ANNUAL REPORT AND 1 1/2 YEARS OF MANIFESTS</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>NONE TO DATE NEEDED</u>

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<u>N/A</u>	<input type="checkbox"/>	
--	--------------------------	------------	--------------------------	--

(If answered Yes, complete the following as applicable.)

- |  |                          |                          |                          |  |
|--|--------------------------|--------------------------|--------------------------|--|
| 1. Exporting Hazardous waste, has a generator:   |                          |                          |                          |  |
| a. Notified the Administrator in writing?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| c. Met the Manifest requirements?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 2. Importing Hazardous Waste, has the generator:   |                          |                          |                          |  |
| Met the manifest requirements?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |

## DISPOSITION OF WASTES

[illegible]

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Two Beloit Corporation plants are located on contiguous property in Rockton. The two plants have been assigned two separate USEPA identification numbers but only one Illinois ID number. Only one of the USEPA numbers is used. Both of the plants are the subject of this inspection. The Blackhawk Plant is a manufacturing plant for wet end paper making. The second plant is a research and development facility for designing and demonstrating the wet end paper making machinery to prospective customers.

The Beloit Corporation had just laid off many employees the Friday before this inspection, so operations and documentation of compliance for the plants were very disorganized. Only one Annual Report and two years of manifests were available.

Only one hazardous waste is generated at this time, laquer thinner. McLeish was not aware that it was being generated at all. Seven drums of the laquer thinner were accumulated in a concrete vault with a two-ton lid that has to be removed with a crane. The vault is 8' x 12' x 5' with an 8" slab of concrete for the cover. One drum outside of the vault was starting to be filled in the plant. Two other drums of laquer thinner were also in the plant, outside of the vault. No analyses of the laquer thinner were available, however, McLeish was having 2 or three haulers making lab checks to obtain analyses.

The Research Plant cleans their materials every few years and starts over. They had just completed the clean-up a short time ago. The materials generated (see attached Disposition of Wastes form) are probably small quantities, but waste analyses and manifest were not available to make determinations.

About 22 small units of naptha, used for small parts cleaning, is maintained by Safety Kleen every month. No analyses of this material was available. McLeish didn't know how much was generated since records were disorganized or inaccessible. No other solvents are used. Chlorinated solvent useage was discontinued several years ago. Beloit Corporation used to mix their hazardous material with their waste oil which was sent to Pierce Oil.

McLeish hopes to close out the laquer thinner storage as soon as possible to become a small quantity generator only. Since no waste analyses were available for any wastes, the only regulation to be cited at this time is 35 Ill. Adm. Code 722.111, Hazardous Waste Determination. Other regulations will be cited as violated as indicated in the report, if regulable quantities of waste are determined hazardous. Beloit Corporation is in the engineering phase of setting up a new wastewater treatment plant. According to McLeish, the plant should be under construction this summer.